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2 Northern District of California
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8 Counsel for Defendant Valle
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10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION
13

14 UNITED STATES OF AMERICA,
15 Plaintiff,
16 v.
17 JASON MICHAEL VALLE,
18 Defendant.
19

Case No.: CR 18–271 JD

**STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE STATUS
CONFERENCE TO NOVEMBER 14,
2018 AND TO EXCLUDE TIME**

20 IT IS HEREBY STIPULATED, by and between the parties to this action, that the status
21 conference date for Defendant Jason Valle, currently scheduled for Wednesday, September 26, 2018,
22 before the Honorable James Donato, be continued to Wednesday, November 14, 2018, at 10:30 a.m.,
23 for a change of plea hearing or motion setting. The basis for this continuance is the need for effective
24 preparation of defense counsel. For this reason, the parties agree and stipulate that the time until
25 November 14, 2018, should be excluded under the Speedy Trial Act, 18 U.S.C. §3161(H)(7)(A) and
26 (B)(iv), because the ends of justice served by the granting of the continuance outweigh the best
27 interests of the public and the defendant in a speedy and public trial.
28

Specifically, the continuance is necessary to accommodate counsel's preparation efforts,

1 including conducting an evidence view, researching the advisory sentencing guidelines and
2 interviewing witnesses. In addition, counsel for Mr. Valle has a conflict and is not available on
3 September 26, 2018.

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5 IT IS SO STIPULATED.

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7 Dated: September 25, 2018

8 STEVEN G. KALAR
9 Federal Public Defender
Northern District of California

10 /S/

11 ANGELA M. HANSEN
Assistant Federal Public Defender

12
13 Dated: September 25, 2018

14 ALEX TSE
15 United States Attorney
Northern District of California

16 /S/

17 SAMANTHA SCHOTT
Special Assistant United States Attorney

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3 IN THE UNITED STATES DISTRICT COURT
4 FOR THE NORTHERN DISTRICT OF CALIFORNIA
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7 UNITED STATES OF AMERICA,

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9 v.

10 JASON MICHAEL VALLE,

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12

Case No.: CR 18-271 JD

**~~[PROPOSED]~~ ORDER TO CONTINUE
STATUS CONFERENCE TO
NOVEMBER 14, 2018 AND TO
EXCLUDE TIME**

13 Based on the reasons provided in the stipulation of the parties above, the court hereby FINDS
14 that the ends of justice served by the granting of the continuance outweigh the best interests of the
15 public and the defendant in a speedy and public trial. The continuance is necessary to accommodate
16 defense counsel's need for effective preparation. Therefore, it is ORDERED that the time from
17 September 26, 2018, through November 14, 2018, is excluded pursuant to 18 U.S.C. §3161(H)(7)(A)
18 and (B)(iv). Further, it is ORDERED that the status conference for Defendant Jason Valle, currently
19 scheduled for September 26, 2018, is continued to November 14, 2018, at 10:30 a.m. for a change of
20 plea hearing or motion setting.

21 **IT IS SO ORDERED.**
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25 Dated: September 25, 2018
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